

# EXHIBIT D

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

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This document relates to:

*Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 4, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 4, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended to include all allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN), ECF No. 1.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Name (alphabetical by last name)</b>	<b>New Plaintiff's State of Residency at Filing (or death)</b>	<b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Kloepfer, Casey	New York	United States	Kloepfer, Ronald	Child	N/A
2	Kloepfer, Dawn	New York	United States	Kloepfer, Ronald	Spouse	N/A
3	Kloepfer, Taylor	New York	United States	Kloepfer, Ronald	Child	N/A
4	Real, Jaime	New York	United States	Kloepfer, Ronald	Child	N/A
5	Santimays, Wendy Ann	Connecticut	United States	Kloepfer, Ronald	Sibling	N/A

Dated: \_\_\_\_\_

Respectfully submitted,

/s/ Jerry S. Goldman

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